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October 11, 2023

**VIA ECF**

The Honorable Jennifer H. Rearden  
United States District Judge  
United States District Court  
500 Pearl Street  
Southern District of New York  
New York, New York 10007

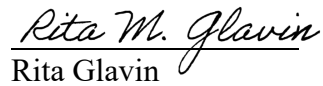
**Re: *United States v. Sergey Shestakov*, 23 Cr. 16 (JHR)**

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter and write to respectfully request a second extension on the time to file our motion to compel, such that the motion will be filed on October 19, 2023 instead of October 13, 2023. We make this request for two reasons: (1) the family of an attorney on our defense team has been personally affected by the violence that broke out in Israel over the weekend and that has adversely impacted our ability to finalize the motion by Friday, October 13; and (2) we very recently learned of another sanctions investigation and indictment directly involving Oleg Deripaska (*U.S. v. Bonham-Carter*, 22 Cr. 503 (S.D.N.Y.)) and that expands the scope of the Rule 16 and *Brady* materials that we seek to compel the government to produce and we must adjust and incorporate that information into our motion to compel.

The government consents to our extension request given the personal circumstances of our defense team member.

Respectfully submitted,

  
Rita Glavin

*Counsel for Defendant Sergey Shestakov*